

1 THE COURT: I just want to go over the ground
2 rules. Section 1.27 of the rules.

3 Basically what this rule provides is that counsel
4 for a witness may advise his client in confidence either
5 upon his own initiative or that of the witness before,
6 during and after the conclusion of the proceeding.

7 Counsel for the witness will be permitted to make
8 objections on the record and to state briefly the basis for
9 such objections in connection with any examination of his
10 client.

11 At the conclusion of the examination of his client
12 counsel may ask clarifying questions if, in my judgment,
13 it's necessary or desirable for the reasons stated.

14 I just wanted to outline the ground rules so that
15 Mr. McVeigh -- He gets a shot at the very very end and not
16 before then. All right?

17 And let me tell Ms. Sumpter, any time that you
18 want to confer with Mr. McVeigh about any of the questions
19 or any of your answers, you just let me know and we'll stop
20 and you'll have an opportunity to confer with Mr. McVeigh.
21 Do you understand that?

22 THE WITNESS: Uh huh.

23 THE REPORTER: Is that a yes?

24 THE WITNESS: Yes.

25 THE COURT: You have to answer yes or no. And you

1 should pull the microphone closer to you.

2 The microphone just goes to the tape recorder so
3 it's not amplifying your voice or anything.

4 The Reporter will tell you if you need to repeat
5 an answer or if you're too far away, so don't be shocked if
6 the Reporter just shouts something out to you.

7 THE WITNESS: Okay.

8 THE COURT: Ms. Lancaster?

9 DIRECT EXAMINATION

10 BY MS. LANCASTER:

11 Q Ms. Sumpter, will you please state your full name
12 for the record?

13 A Melissa Sumpter Ellington.

14 Q Did you recently get married?

15 A Yes.

16 Q When did you get married?

17 A December 16, 2000.

18 Q Is Ellington your married name?

19 A Yes, ma'am.

20 Q So prior to December of 2000 you were known as
21 Melissa Sumpter?

22 A Yes.

23 Q You understand that if we refer to you as Melissa
24 Sumpter in our questions that we mean you?

25 A Yes. That's okay.

1 Q Because we're used to calling you Melissa Sumpter.

2 A That's okay.

3 Q And I believe the documents that I will ask you to
4 look at were executed under the name Melissa Sumpter. I
5 just want to make it clear that for the record you can
6 correct us, but we're always going to be asking about your
7 documents, of things that have your name associated with
8 them, okay?

9 A That's fine.

10 Q What is your home address?

11 A 831 Versailles, Mesquite, Texas 75149.

12 Q How long have you lived there?

13 A About nine months.

14 Q Since your marriage? Did you move there --

15 A I moved there before I married.

16 Q So you kept the same address after you got
17 married?

18 A Yes.

19 Q How old are you?

20 A I'm 27.

21 Q What's your birthday?

22 A 11/30/73.

23 Q Are you employed?

24 A Yes, ma'am.

25 Q Where are you employed?

1 A Doctors Hospital.

2 Q What do you do at Doctors Hospital?

3 A I'm an RN.

4 Q How long have you worked at Doctors Hospital?

5 A It's been over three years now.

6 Q Do you recall the date that you started to work
7 there?

8 A I think it was sometime the first part of January
9 of '98.

10 Q Were you employed prior to that time?

11 A No, I was not.

12 Q What did you do?

13 A I was in school.

14 Q Where did you go to school?

15 A At Mary Hurn [ph] in Baylor.

16 Q And you graduated when?

17 A December '97.

18 Q While you were attending school did you also work?

19 A Only in the summer.

20 Q Where did you work in the summer?

21 A Various places. A couple of summers I babysat.

22 One summer I worked at a camp.

23 Q Did you work for your father?

24 A During Christmas.

25 Q Every Christmas?

1 A Not every Christmas.

2 Q Do you recall the last Christmas that you worked
3 in your father's office?

4 A I don't recall which last Christmas, no.

5 Q Do you remember approximately how long ago it was?

6 A I'd say it's been about six years. Six
7 Christmases ago, maybe.

8 Q Do you recall how many Christmases you worked in
9 your dad's office?

10 A I don't recall how many.

11 Q Do you recall your duties, what you did when you
12 worked in your dad's office?

13 A I would type up things that he would want to mail
14 and I'd make a lot of copies. That's mostly what I did is
15 make copies of things. I filed, I don't know what they're
16 called, they're the CPA laws, whatever they go by. You have
17 to refile those things every year. And I would just run
18 errands like to the bank and the post office.

19 Q Did you have any duties while you were at your
20 dad's that related to the work or the business of DLB?

21 A No, ma'am.

22 Q Did you see documents or review documents while
23 you worked at your dad's that had anything to do with DLB?

24 A No, ma'am.

25 THE COURT: Do you know what DLB is?

1 THE WITNESS: It's Uncle Ronald, it's their
2 company.

3 THE COURT: Can you hear all of that?

4 THE REPORTER: Not very well, Your Honor.

5 THE COURT: If you'd keep your voice up. I think
6 the witness said Uncle Ronald -- Why don't you repeat it.

7 THE WITNESS: Uncle Ronald's company.

8 THE COURT: Uncle Ronald's company.

9 BY MS. LANCASTER:

10 Q For the record, Uncle Ronald is Ronald Brasher, is
11 that correct?

12 A That's correct.

13 Q And he is your uncle?

14 A Yes.

15 Q How is he related to you?

16 A He's married to my mother's sister.

17 Q Your Aunt Pat is your mother's sister, is that
18 correct?

19 A Yes, ma'am.

20 Q And your mother is Norma Sumpter?

21 A Yes.

22 Q And your father is Jim Sumpter?

23 A Yes, ma'am.

24 Q And Jim Sumpter is a CPA?

25 A Yes, ma'am.

1 Q Do you have any knowledge about the fact that Jim
2 Sumpter was the CPA or the accountant for DLB?

3 A Yes, ma'am.

4 Q How do you know that?

5 A Because I just knew that he was their accountant.
6 I don't know how I --

7 Q You don't recall how you first learned that?

8 A I just, they told me at one point I guess.

9 Q I'm not trying to trick you.

10 A Oh, I know. I don't know how to answer it.

11 Q That's fine. Just tell me you don't know how to
12 answer it.

13 A I just know he was their accountant for a long
14 time.

15 Q How many applications for FCC licenses have you
16 signed?

17 A One.

18 Q Do you recall when you signed it?

19 A I recall signing one in the early '90s.

20 Q The early '90s. '91, '92, or '95, '96? Can you
21 be a little bit more specific?

22 A I would say it's closer to the late '80s, early
23 '90s, but I don't know, I would say sometime before '93,
24 because I remember signing it when I was in high school, and
25 I graduated high school in '93, so it would have to be

1 before then.

2 Q You have a specific memory of signing it while you
3 were in high school?

4 A Yes, ma'am.

5 Q Did you realize at the time it was an application
6 or had you just been told that that's what it was?

7 A That's what I was told it was.

8 Q Did you review the form before you signed it?

9 A No, I didn't.

10 Q Who asked you to sign it?

11 A My mother and my Aunt Patsy.

12 Q Where was it that you signed it?

13 A At my parents' house in the kitchen.

14 Q Did you get any other papers regarding that
15 application or a license?

16 A No, I didn't.

17 Q Do you have any knowledge of whether or not a
18 license was ever issued as a result of you signing that
19 piece of paper?

20 A No. I know there wasn't one ever issued because
21 of our deposition. I was told during the deposition that
22 there was never one issued.

23 Q At the time --

24 THE COURT: You were told that, but do you know
25 whether or not there was ever one issued of your own memory?

1 THE WITNESS: No. Not of my own memory.

2 THE COURT: Try to answer your questions, the
3 questions here today based upon your own memory, not what
4 anyone else told you.

5 THE WITNESS: Okay.

6 THE COURT: And if you can't remember, you can't
7 remember.

8 THE WITNESS: Okay.

9 BY MS. LANCASTER:

10 Q When you said you were told that, you were told
11 that by Mr. Romney?

12 A Yes.

13 MR. ROMNEY: I'm sorry, Your Honor. I missed
14 that.

15 What did I tell this witness?

16 MS. LANCASTER: That a license was not issued in
17 the early '90s in her name.

18 MR. ROMNEY: I didn't realize I was a witness in
19 this case, Your Honor.

20 BY MS. LANCASTER:

21 Q When you say you were told that, are you basing
22 that statement upon the fact that you were questioned in
23 such a way by Mr. Romney that it led you to believe that
24 there was never a license issued in your name in the early
25 '90s?

1 A Yes.

2 Q He didn't meet you after the deposition and take
3 you aside --

4 A No, no. It was during the deposition that he told
5 me.

6 Q Would you turn in the book that has all the tabs,
7 would you turn to Exhibit No. 49. It has a 49 on it.

8 (Pause)

9 Q Have you found Exhibit 49?

10 A Yes, ma'am.

11 Q Do you recognize this document?

12 (Pause)

13 THE COURT: Look through all the pages if you
14 would, please, and if you need more time to look at them let
15 me know and you'll have as much time as you need.

16 MS. LANCASTER: Your Honor, in order to help
17 clarify the record, Exhibit 49 is also page 16 of Exhibit
18 52.

19 THE WITNESS: I recognize the signature page.

20 MS. LANCASTER: Or it begins actually on page 15
21 of Exhibit 52.

22 BY MS. LANCASTER:

23 Q You recognize the signature page? Would that be
24 page three of Exhibit 49?

25 A Yes, ma'am.

1 Q The signature page in Block 42, there appears a
2 signature of Melissa Sumpter. Do you see that?

3 A Yes, ma'am.

4 Q Did you sign that?

5 A No, ma'am.

6 Q That's not your signature?

7 A That's not my signature.

8 Q How about in Block 43, there's a date next to the
9 signature line that says 6/18/96 that's handwritten in. Did
10 you write that date in?

11 A No, ma'am.

12 Q Do you know who did?

13 A No, I do not know.

14 Q Do you recognize the handwriting?

15 A No, I do not.

16 Q Please turn to Exhibit 52, page 14. And the page
17 numbers are in little circles at the bottom.

18 (Pause)

19 Q Have you found it?

20 A Yes, ma'am.

21 Q Do you recognize that radio license?

22 A I've seen it before in all the exhibits I've gone
23 through, but up until this started, no, I wouldn't have
24 recognized it.

25 Q It indicates that there's a radio license in the

1 name of Melissa Sumpter for a station who's call sign is
2 WPJS437. Prior to 1997, were you aware that there was a
3 license in your name?

4 A No, ma'am.

5 Q If you look on here it indicates up in the top
6 right hand corner that this license was issued 10/2/96.
7 Prior to 10/2/96 were you aware that an application for a
8 license had been issued in your name?

9 A No, ma'am.

10 Q Other than the one in the early --

11 A -- the one I signed in the early '90s.

12 Q -- late '80s, early '90s that you previously
13 testified about?

14 MR. ROMNEY: Objection. Leading, Your Honor.

15 THE COURT: Yeah, it was leading. That's number
16 one.

17 Number two, try to wait for Ms. Lancaster to
18 finish her question before you answer.

19 Number three, you said application was issued.
20 Applications aren't issued.

21 MS. LANCASTER: I stand corrected, Your Honor.

22 THE COURT: So you might want to rephrase it in a
23 non-leading manner.

24 MS. LANCASTER: Okay.

25

1 BY MS. LANCASTER:

2 Q Did you ever submit an application for a radio
3 license other than the application that you testified to
4 that you think you signed in the late '80s or early '90s?
5 Did you ever submit any other radio license application?

6 A No, ma'am.

7 Q Did you ever sign one with the understanding that
8 it would be submitted?

9 A No, ma'am.

10 Q Did you ever sign one period?

11 A I never signed one.

12 Q In 1996 did you receive in the mail a copy of page
13 14 of Exhibit 52?

14 A No.

15 Q At that time were you living at 4008 Harbinger
16 Drive, Mesquite, Texas?

17 A No, ma'am.

18 Q What was your address at that time?

19 A My permanent address would have been 4406
20 Harbinger.

21 Q And 4406 Harbinger is your parents' address?

22 A My parents' address.

23 Q In 1996 were you living at 4406 Harbinger? You
24 said that was your permanent address, but did you live there
25 on a day to day basis?

1 A No. Mostly I was at school still.

2 Q What was your address away at school?

3 A It was a PO box. I can't remember it.

4 Q How far away is the college from your parents'
5 home, approximately?

6 A It's about three hours.

7 Q A three hour drive?

8 A Would you turn to Exhibit 1.

9 (Pause)

10 Q Did you receive a copy of Exhibit 1 in 1997?

11 A Yes.

12 Q Do you recall getting it?

13 A I recall it being at my house by the time I got
14 home from school.

15 Q Was it opened in an envelope or was it --

16 A I don't recall if the envelope was open or not.

17 Q Did you read through it?

18 A Yes, I looked through it.

19 Q What did you do with it?

20 A I probably kept it somewhere.

21 Q Up until the receipt for the petition to show
22 cause which is Exhibit No. 1, did you realize that there was
23 a license at that time issued in your name?

24 A No, I didn't.

25 Q Look at Exhibit No. 2 which is the opposition that

1 was filed in response to Exhibit No. 1. In 1997 did you see
2 that document?

3 A No, I didn't see this.

4 Q When was the first time you've seen this document?

5 A Really the first time I've seen this document was
6 this past week.

7 Q Who showed it to you?

8 A I guess my dad.

9 Q Did you ever authorize anyone to file anything
10 with the FCC on your behalf in 1997?

11 A No, ma'am.

12 Q Turn to Exhibit 51, please.

13 (Pause)

14 Q Have you seen that document before?

15 THE COURT: Take your time and look through it.

16 (Pause)

17 THE WITNESS: I don't recall ever seeing this
18 document.

19 BY MS. LANCASTER:

20 Q How about Exhibit 52?

21 (Pause)

22 A Yes, ma'am.

23 THE REPORTER: I can't hear the witness, I'm
24 sorry, Your Honor.

25 THE WITNESS: Yes.

1 THE COURT: Please try to keep your voice up.

2 BY MS. LANCASTER:

3 Q When is the first time you saw what's been marked
4 as Exhibit 52?

5 A When was the first time I saw it in this draft, or
6 -- I mean I wrote the words down and then we gave it to Mr.
7 McVeigh to review it, and they typed it.

8 Q Look on page six of Exhibit 52.

9 (Pause)

10 Q Is that your signature?

11 A Yes, ma'am.

12 Q Are the statements contained in Exhibit 52
13 accurate to the best of your knowledge?

14 A As far as I know, yes, ma'am.

15 Q That's your response to the questions?

16 A That's my response.

17 Q I believe you stated that in 1997 you received a
18 copy of the Net Wave petition which is Exhibit No. 1. Do
19 you understand what I mean when I refer to Exhibit No. 1 as
20 the Net Wave petition?

21 A Yes, ma'am.

22 Q And you got a copy of that in 1997?

23 A Yes, ma'am.

24 Q Did you get any other documents about the same
25 time or in that same time period from the FCC?

1 A About that same time we got the 800 forms.

2 Q Look at Exhibit 52, page eight.

3 (Pause)

4 Q Have you got that?

5 A Yes, ma'am.

6 Q Do you recognize that document?

7 A Yes, ma'am.

8 THE COURT: When you say you got that, do you mean
9 you got page eight in the mail, or do you mean you have page
10 eight to review at this moment?

11 MS. LANCASTER: I'll be clearer in the future,
12 Your Honor.

13 BY MS. LANCASTER:

14 Q You found page eight of Exhibit 52, haven't you?

15 A Yes, ma'am.

16 Q And do you recall receiving that document in the
17 mail?

18 A I recall it being there when I got home and I
19 looked over it. I mean I wasn't there when it got home in
20 the mail, because I just wasn't home. I was at school.

21 Q Do you see the date at the top of that document
22 says 11/17/97?

23 A Yes, ma'am.

24 Q Do you have any memory of how close to that time
25 it was that you actually first viewed this particular

1 document?

2 A It was probably Thanksgiving break, but I don't
3 know when that was that year.

4 Q Did you sign it?

5 A No, ma'am.

6 Q Did you read it?

7 A Yes, ma'am.

8 Q Why didn't you sign it?

9 A We didn't want a license in our name.

10 Q As a result of the receipt of the 800A which is
11 the document on page eight, you understand when I say 800A
12 what document I'm referring to?

13 A Yes, ma'am.

14 Q As a result of receiving that and receiving the
15 Net Wave petition which is Exhibit 1, did you do anything
16 after you got these?

17 A No.

18 Q Did you talk to anyone about them?

19 A I talked to my family, because they got the same
20 thing.

21 Q When you say you talked to your family, who in
22 your family did you talk to?

23 A My mother and my sister and my father.

24 Q And you stated that they all got the same
25 documents, right?

1 A Yes.

2 Q Did you talk to anyone from DLB?

3 A No, I did not.

4 Q Look at Exhibit 53. Do you recognize Exhibit 53?

5 A Yes, ma'am.

6 Q Is it a letter you wrote to Ronald and Pat Brasher
7 on November 29, 1997?

8 A My father typed it and had us read it and I signed
9 it.

10 Q That is your signature on this document?

11 A that is my signature.

12 Q Do you agree with what it says?

13 A Yes, ma'am.

14 Q Did you mail it?

15 A No, my father probably mailed it, or my mother.

16 Q After you signed it you gave it back to your
17 father or mother?

18 A Yes, ma'am.

19 Q Go back to Exhibit 52 and look at page 10,
20 please.

21 (Pause)

22 Q Do you recognize that document?

23 A Yes, ma'am.

24 Q Is that your signature on the signature line?

25 A That's my signature.

1 MR. ROMNEY: I'm sorry, I can't hear that.

2 THE WITNESS: That's my signature.

3 MR. ROMNEY: Thank you.

4 MR. WILSON: It is her --

5 THE WITNESS: It is.

6 BY MS. LANCASTER:

7 Q Did you also put the date on this document?

8 A Yes, ma'am. I did.

9 Q Can you tell the Judge what the circumstances were
10 surrounding you signing this particular document?

11 A My Uncle Ronald gave these to my dad and said that
12 if we'd sign them --

13 MR. ROMNEY: Objection. Hearsay, Your Honor.

14 MS. LANCASTER: Your Honor, it explains conduct.
15 It's not offered necessarily for the matter of the truth
16 asserted.

17 MR. ROMNEY: Well it obviously is, Your Honor. I
18 mean to show what Uncle Ronald did or did not say. She
19 didn't have a discussion with Uncle Ronald. She only talked
20 with her dad.

21 THE COURT: I'll accept it for state of mind
22 purposes.

23 BY MS. LANCASTER:

24 Q Go ahead.

25 A He said that if we would sign these that the

1 license would be transferred out of our name, and we wanted
2 the license transferred out of our name because we wanted
3 our names off this. That's why we signed it.

4 Q So when you signed this, you thought this was
5 going to get the license out of your name.

6 A We hoped. Yeah, we thought.

7 Q When you say we, I'm asking you about you.

8 A Yes.

9 Q Did you think when you signed this that this would
10 get the license out of your name?

11 A Yes.

12 Q Would you also look at page 12 of Exhibit 52.

13 (Pause)

14 Q Do you remember receiving this document?

15 A Yes, ma'am.

16 Q Who gave it to you, or how did you get it?

17 A I think it came in the mail.

18 Q The date at the top right hand corner of it says
19 3/31/98. Is that about the time period within which you
20 remember receiving it?

21 A Yes, ma'am.

22 Q Did you read it?

23 A Yes, ma'am.

24 Q Did you sign it?

25 A No.

1 Q What did you do with it?

2 A Probably just kept it. It was telling us the
3 license was canceled.

4 Q You understood this to mean that your license was
5 canceled?

6 A Yes, ma'am.

7 Q Turn to Exhibit 34, please.

8 (Pause)

9 THE COURT: Take as much time as you need to
10 familiarize yourself with the document.

11 (Pause)

12 BY MS. LANCASTER:

13 Q Do you recognize Exhibit 34?

14 A Yes, ma'am.

15 Q You've seen it before?

16 A I've seen it before.

17 Q Was it filed on your behalf with the FCC?

18 A Yes, ma'am.

19 Q It was done with your permission?

20 A Yes, ma'am.

21 Q Do you agree with the statements contained in
22 Exhibit 34?

23 A Yes, ma'am.

24 (Pause)

25 Q Look at page 46 of Exhibit 34.

1 THE COURT: Are you finished with -- Is this your
2 signature on page 18 of Exhibit 34?

3 THE WITNESS: Yes, it is my signature.

4 THE COURT: Okay. Now what page?

5 MS. LANCASTER: I'll tell you what, Judge. Go to
6 page 45. Exhibit 12 of -- It's labeled Exhibit 12 on page
7 44, but it's Attachment 12 to Exhibit 34. Page 45.

8 (Pause)

9 MS. LANCASTER: And it's also page 46.

10 BY MS. LANCASTER:

11 Q Would you look at page 45 and 46 and tell me if
12 they appear to be the same page to you.

13 (Pause)

14 Q And page 47.

15 THE COURT: Well, we didn't get an answer to 46.

16 BY MS. LANCASTER:

17 Q Look at all three of those pages, though, if you
18 don't mind, Ms. Sumpter.

19 MR. ROMNEY: Could you have a restatement please
20 for the record, Your Honor what pages we're looking at.

21 THE COURT: We're on Exhibit 34, pages 45, 46 and
22 47.

23 And the question was do all these look to Ms.
24 Sumpter as the same page. And I'm saying Ms. Sumpter
25 because that was your name when these things were -- And

1 that's no disrespect by not calling you Mrs. Ellington.

2 THE WITNESS: No, that's okay.

3 BY MS. LANCASTER:

4 Q Do those pages all appear to be duplicates of each
5 other?

6 A They look the same to me.

7 Q Would you also look in Exhibit 19, which is the
8 other notebook. Stay where you are in that notebook, but
9 look in Exhibit 19 at page 216.

10 (Pause)

11 THE COURT: Well, can I make an observation?

12 MS. LANCASTER: Certainly.

13 THE COURT: Exhibit 34, pages 45, 46, and 47 have
14 the Bates numbers on them, and if everybody wants to
15 stipulate that these are Exhibit 19, page 216, page 393, and
16 page 418, that might save a little time.

17 MS. LANCASTER: I'm certainly willing to stipulate
18 to that, Your Honor.

19 MR. PEDIGO: Yes, Your Honor.

20 THE COURT: Mr. Romney, did you hear that?

21 MR. ROMNEY: I'll stipulate to that, Your Honor

22 Although I would point out to the Court that the
23 copies found in Exhibit 21 are better copies of the poor
24 copies to begin with.

25 THE COURT: I agree. I'll stipulate to that.

1 BY MS. LANCASTER:

2 Q Ms. Sumpter, is that your signature on that page?

3 THE COURT: Why don't you direct the witness to
4 page 216 of Exhibit 19, because it is a better copy.

5 MS. LANCASTER: Okay.

6 THE COURT: You can ask about the other two if you
7 wish, but I think we ought to have the best available copy
8 in front of the witness.

9 BY MS. LANCASTER:

10 Q Is that your signature on that page, Ms. Sumpter?

11 A No. That's not my signature.

12 Q Are you positive?

13 A It looks like it, but it's not my signature.

14 Q Why do you think it's not your signature?

15 A Well, because I know I didn't sign this. And it
16 could easily have been lifted from something.

17 THE COURT: It could have been what? Lifted? Did
18 you say lifted?

19 THE WITNESS: Lifted, rewritten, copied over.

20 BY MS. LANCASTER:

21 Q But you did not sign this document?

22 A I did not sign it.

23 Q Do you recall on June 22, 1996 going to visit your
24 Aunt Pat and Uncle Ronald's, going to their house?

25 A I don't recall that, going to their house on that

1 specific date, no.

2 Q Did you normally --

3 MS. LANCASTER: Would everyone stipulate that that
4 was a Saturday?

5 MR. ROMNEY: Yes.

6 MR. PEDIGO: Yes.

7 MR. WILSON: Yes.

8 BY MS. LANCASTER:

9 Q Did you go to your Aunt Pat and Uncle Ronald's
10 house frequently on Saturdays that summer? Do you remember?

11 A Not frequently, no.

12 Q Did you occasionally go?

13 A Occasionally.

14 Q Did you ever go to your Aunt Pat and Uncle
15 Ronald's house and have a conversation with either your Aunt
16 Pat or your Uncle Ronald about signing a client copy of an
17 application in your name?

18 A No, I did not.

19 THE COURT: May I ask a question here? Of course
20 I may. I'm the Judge.

21 Directing your attention to page 216 of Exhibit
22 19, it kind of intrigues me when you said that the
23 signature, you think it might have been lifted from
24 something or copied from something. Who would have
25 something in their possession that would have your real

1 signature on it?

2 THE WITNESS: I had mailed them that letter
3 earlier in November with my signature on it.

4 THE COURT: Who's them?

5 THE WITNESS: Pat and Ronald.

6 THE COURT: And there's nothing your home that
7 would have your real signature on it?

8 THE WITNESS: In my home?

9 THE COURT: In your parents' home. Isn't that
10 where you lived at the time permanently?

11 THE WITNESS: Uh huh. When I was home from
12 school. There might have been something there with my
13 signature on it.

14 THE COURT: Or in your father's office?

15 THE WITNESS: Probably.

16 THE COURT: You worked. Did you pay taxes on the
17 amount of money you earned when you were in school or --

18 THE WITNESS: Yes, I did. Well when I worked
19 during the summer.

20 THE COURT: Did your father prepare those tax
21 returns?

22 THE WITNESS: Yes.

23 THE COURT: He didn't sign your name to them, you
24 did.

25 THE WITNESS: No, I signed.